

**Remarks**

The Office Action mailed April 26, 2005 and made final has been carefully reviewed and the foregoing amendment has been made in consequence thereof.

Applicants and the undersigned wish to express their appreciation to the Examiner for the courtesies she extended during a telephone interview that occurred on September 14, 2005. During the interview, the Final Office Action dated April 26, 2005 was discussed. More specifically, the undersigned discussed (i) withdrawing the 102(b) and 102(e) rejections in this matter, and (ii) allowing this case because the amended claims include the allowable subject matter from an allowed sister-case (U.S. Patent Application No. 09/474,539).

During the telephone interview, the undersigned advised the Examiner that the present case has a sister-case recently allowed by the U.S. Patent Office. The sister-case is U.S. Patent Application No. 09/474,539 which is entitled Methods and Systems for Analyzing Marketing Campaigns. Although the sister-case has been allowed by the Patent Office and the Issue Fee has been paid, the sister-case has not yet published as a U.S. Patent. As discussed on the telephone, Applicants respectfully submit that the presently pending claims include the allowable subject matter from the allowed sister-case. Accordingly, Applicants submit that the present case is in condition for allowance. The Examiner advised that she would review this case without a Request for Continued Examination (RCE), and would contact the undersigned if she had any questions.

In addition, the undersigned advised the Examiner during the telephone interview that Applicants would address herein the Section 101, Section 102(b) and Section 102(e) rejections in the Office Action.

The following remarks have been made in consequence of the Examiner Interview. Accordingly, Applicants respectfully submit that the present patent application is in condition for allowance.

Claims 1-22 are pending in this application. Claims 1-22 stand rejected.

In accordance with 37 C.F.R. 1.136(a), a two month extension of time is submitted herewith to extend the due date of the response to the Office Action dated April 26, 2005, for the above-identified patent application from July 26, 2005, through and including September 26, 2005. In accordance with 37 C.F.R. 1.17(a)(3), authorization to charge a deposit account in the amount of \$450.00 to cover this extension of time request also is submitted herewith.

The rejection of Claims 9-19 and 22 under 35 U.S.C. § 101 as being directed to non-statutory subject matter is respectfully traversed.

The Office Action asserts at page 3 that the “system claims must be made up of hardware elements in order to be statutory”. Applicants respectfully submit that Claim 9 has been amended to recite “...said system comprising...*a computer* comprising a targeting engine, the computer is coupled to the database and the graphical user interface....” (Emphasis added.) Claim 9 therefore includes a hardware element, namely a computer. Accordingly, Claim 9 satisfies Section 101.

Dependent Claims 10-19 and 22 depend from independent Claim 9, and these dependent claims are submitted to satisfy the requirements of Section 101 for the same reasons set forth above with respect to independent Claim 9.

The rejection of Claims 1-22 under 35 U.S.C. § 102(b) based upon a public use or sale of the invention in view of a General Electric Company Website dated 1997 (referred to herein as the “1997 Website”) is respectfully traversed.

The Office Action asserts at page 4 that the 1997 Website “discloses that the assignee was providing credit and insurance services to retailers and consumers around the world” and that “the services offered, including marketing support.” Moreover, the Office Action asserts that the 1997 Website discloses a system that “identifies and targets customer groups using technology-based system that produce proprietary, segmented databases” and that “Marketing experts then work with the retailer customers to evaluate the segments and develop promotions aimed at customer groups identified with high sales potential.” The Office Action further asserts that the 1997 Website is a basis for a Section 102(b) rejection. Applicants respectfully traverse these assertions.

Claim 1 recites a method of evaluating marketing campaign data, the data being in the form of database scores, stored procedures, and On Line Analytical Processing (OLAP) multidimensional structures, the method includes “providing a plurality of analytic models including risk models and marketing models, each model is a statistical analysis for predicting a behavior of a prospective customer, wherein a risk model predicts a likelihood of whether the prospective customer will at least one of pay on time, be delinquent with a payment, and declare bankruptcy, and wherein the marketing models include a net present value/profitability model, a prospect pool model, a net conversion model, an attrition model, a response model, a revolver model, a balance transfer model, and a reactivation model...embedding the models within a targeting engine...determining a sequential order for combining the models using the targeting engine, the model combination includes a risk model and at least one of the marketing models...combining the models in the determined sequential order using the targeting engine to generate marketing campaign data including a target group by defining an initial customer group, the initial customer group includes a list of customers satisfying each of the combined models and rank ordered by projected profitability wherein projected profitability is based on at least one of a probable response by a customer to the marketing campaign, attrition of the customer, and risk associated with the customer, the list includes a high profit end, a moderate profit section, and a low profit end, the high profit end including customers having a highest projected

profitability, the low profit end including customers having a lowest projected profitability, the moderate profit section including a profitability baseline, wherein the determined sequential order provides a greater number of customers included between the high profit end and the profitability baseline than any other sequential order of combining the models, the target group includes the customers included between the high profit end of the list and the profitability baseline...evaluating the model combination using structures that segment gains charts to discover where the model combination is under performing...evaluating a performance of the model combination over time...and defining user trends.”

Applicants respectfully submit that the 1997 Website does not describe or suggest the present invention. More specifically, Applicants submit that the 1997 Website does not describe or suggest a method of evaluating marketing campaign data including “*providing a plurality of analytic models including risk models and marketing models*, each model is a statistical analysis for predicting a behavior of a prospective customer, wherein a risk model predicts a likelihood of whether the prospective customer will at least one of pay on time, be delinquent with a payment, and declare bankruptcy, and *wherein the marketing models include a net present value/profitability model, a prospect pool model, a net conversion model, an attrition model, a response model, a revolver model, a balance transfer model, and a reactivation model*”.

(Emphasis added.)

Moreover, the 1997 Website does not describe or suggest “*determining a sequential order for combining the models using the targeting engine, the model combination includes a risk model and at least one of the marketing models...combining the models in the determined sequential order using the targeting engine to generate marketing campaign data including a target group by defining an initial customer group*, the initial customer group includes a list of customers satisfying each of the combined models and rank ordered by projected profitability wherein projected profitability is based on at least one of a probable response by a customer to the marketing campaign, attrition of the customer, and risk associated with the customer, the list

includes a high profit end, a moderate profit section, and a low profit end, the high profit end including customers having a highest projected profitability, the low profit end including customers having a lowest projected profitability, the moderate profit section including a profitability baseline, wherein the determined sequential order provides a greater number of customers included between the high profit end and the profitability baseline than any other sequential order of combining the models, the target group includes the customers included between the high profit end of the list and the profitability baseline....” (Emphasis added.)

For at least the reasons stated above, Applicants respectfully submit that Claim 1 is patentable over the 1997 Website.

Claims 2-8 and 21 depend from independent Claim 1. When the recitations of Claims 2-8 and 21 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 2-8 and 21 likewise are patentable over the 1997 Website.

Claim 9 recites a system for evaluating marketing campaign data, the system includes “a customer database further comprising historical campaign results...a graphical user interface for presentation of trend analysis data...and a computer comprising a targeting engine, the computer is coupled to the database and the graphical user interface, the targeting engine embedded with a plurality of analytic models including risk models and marketing models, each model is a statistical analysis for predicting a behavior of a prospective customer, wherein a risk model predicts a likelihood of whether the prospective customer will at least one of pay on time, be delinquent with a payment, and declare bankruptcy, and wherein the marketing models include a net present value/profitability model, a prospect pool model, a net conversion model, an attrition model, a response model, a revolver model, a balance transfer model, and a reactivation model, the targeting engine is configured to...determine a sequential order for combining the models, the model combination includes a risk model and at least one marketing model...combine the models in the determined sequential order to generate marketing campaign data including a target group by defining an initial customer group, the initial customer group includes a list of

customers satisfying each of said combined models and rank ordered by projected profitability wherein projected profitability is based on at least one of a probable response by a customer to the marketing campaign, attrition of the customer, and risk associated with the customer, the list includes a high profit end, a moderate profit section, and a low profit end, the high profit end including customers having a highest projected profitability, the low profit end including customers having a lowest projected profitability, the moderate profit section including a profitability baseline, wherein the determined sequential order provides a greater number of customers included between the high profit end and the profitability baseline than any other sequential order of combining the models, the target group includes the customers included between the high profit end of the list and the profitability baseline...evaluate the model combination using structures that segment gains charts to discover where the model combination is under performing...evaluate a performance of the model combination over time...and define trends relating to the marketing campaign data.”

Claim 9 recites a system for evaluating marketing campaign data that includes a computer having a targeting engine configured to perform steps essentially similar to those recited in Claim 1. Thus, it is submitted that Claim 9 is patentable over the 1997 Website for at least the reasons that correspond to those given with respect to Claim 1.

Claims 11-19 and 22 depend from independent Claim 9. When the recitations of Claims 11-19 and 22 are considered in combination with the recitations of Claim 9, Applicants submit that dependent Claims 11-19 and 22 likewise are patentable over the 1997 Website.

The Office Action further requests “Any further documentation provided to the customer of GE Capital concerning the marketing and other services provided as well as any documentation concerning the technology-based systems used to produce the segmented databases of GE Capital”. Applicants respectfully submit that it has made a good faith attempt to obtain the requested information by conducting a reasonable inquiry into whether the requested

information is readily available to Applicants, and based on this inquiry Applicants submit that the information requested herein is unknown and/or is not readily available to Applicants.

For at least the reasons set forth above, Applicants respectfully request that the 35 U.S.C. § 102(b) rejection of Claims 1-22 be withdrawn.

The rejection of Claims 1-22 under 35 U.S.C. § 102(e) as being anticipated by Honarvar (U.S. Patent No. 6,321,206) is respectfully traversed.

Applicants respectfully submit that Honarvar does not describe or suggest the claimed invention. As discussed below, at least one of the differences between Honarvar and the present invention is that Honarvar neither describes nor suggests a method that includes providing a plurality of analytic models including risk models and marketing models, each model is a statistical analysis for predicting a behavior of a prospective customer, wherein a risk model predicts a likelihood of whether the prospective customer will at least one of pay on time, be delinquent with a payment, and declare bankruptcy, and wherein *the marketing models include a net present value/profitability model, a prospect pool model, a net conversion model, an attrition model, a response model, a revolver model, a balance transfer model, and a reactivation model.* (Emphasis added.)

Moreover, Honarvar does not describe or suggest *determining a sequential order for combining the models* using the targeting engine *wherein the model combination includes a risk model and at least one of the marketing models, and combining the models in the determined sequential order using the targeting engine to generate marketing campaign data including a target group by defining an initial customer group, the initial customer group includes a list of customers satisfying each of the combined models and rank ordered by projected profitability* wherein projected profitability is based on at least one of a probable response by a customer to the marketing campaign, attrition of the customer, and risk associated with the customer, the list includes a high profit end, a moderate profit section, and a low profit end, the high profit end

includes customers having a highest projected profitability, the low profit end includes customers having a lowest projected profitability, and the moderate profit section includes a profitability baseline, wherein the determined sequential order provides a greater number of customers included between the high profit end and the profitability baseline than any other sequential order of combining the models and the target group includes the customers included between the high profit end of the list and the profitability baseline. (Emphasis added.)

Honarvar describes a software-based decision management system that allows an organization to monitor and evaluate client performance data relating to client interactions with the organization, and to appropriately modify organizational strategies in accordance with the performance data. More specifically, the system (a) applies different strategies to different categories of clients of the organization, (b) tracks the performance of the clients as a result of the applied strategies, and (c) refines the applied strategies based on the tracked performance to increase client value over time to the organization. For example, in a specific embodiment, clients are assigned into categories and test groups to define a data structure conceptually representable as a matrix having first and second axes with the categories on the first axis and the test groups on the second axis, the intersection of each category and test group in the matrix defining a test cell. Different strategies are applied to clients within different test cells. The movement of clients is tracked between categories as a result of the applied strategies. The applied strategies are then refined based on the tracked movement.

Claim 1 is recited hereinabove.

Honarvar does not describe or suggest a method as recited in Claim 1. More specifically, Honarvar neither describes nor suggests a method that includes providing a plurality of analytic models including risk models and marketing models, each model is a statistical analysis for predicting a behavior of a prospective customer, wherein a risk model predicts a likelihood of whether the prospective customer will at least one of pay on time, be delinquent with a payment, and declare bankruptcy, and wherein *the marketing models include a net present*



*value/profitability model, a prospect pool model, a net conversion model, an attrition model, a response model, a revolver model, a balance transfer model, and a reactivation model.*

(Emphasis added.)

Moreover, Honarvar does not describe or suggest *determining a sequential order for combining the models using the targeting engine wherein the model combination includes a risk model and at least one of the marketing models, and combining the models in the determined sequential order using the targeting engine to generate marketing campaign data including a target group by defining an initial customer group, the initial customer group includes a list of customers satisfying each of the combined models and rank ordered by projected profitability wherein projected profitability is based on at least one of a probable response by a customer to the marketing campaign, attrition of the customer, and risk associated with the customer, the list includes a high profit end, a moderate profit section, and a low profit end, the high profit end includes customers having a highest projected profitability, the low profit end includes customers having a lowest projected profitability, and the moderate profit section includes a profitability baseline, wherein the determined sequential order provides a greater number of customers included between the high profit end and the profitability baseline than any other sequential order of combining the models and the target group includes the customers included between the high profit end of the list and the profitability baseline.* (Emphasis added.)

Rather, Honarvar describes a software-based decision management system that (a) applies different strategies to different categories of clients of the organization, (b) tracks the performance of the clients as a result of the applied strategies, and (c) refines the applied strategies based on the tracked performance to increase client value over time to the organization. Accordingly, Applicants respectfully submit that Claim 1 is patentable over Honarvar.

For at least the reasons set forth above, Claim 1 is submitted to be patentable over Honarvar.

Claims 2-8 and 21 depend from independent Claim 1. When the recitations of Claims 2-8 and 21 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 2-8 and 21 likewise are patentable over Honarvar.

Claim 9 is recited hereinabove.

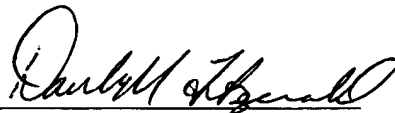
Claim 9 recites a system for evaluating marketing campaign data that includes a computer having a targeting engine configured to perform steps essentially similar to those recited in Claim 1. Thus, it is submitted that Claim 9 is patentable over Honarvar for at least the reasons that correspond to those given with respect to Claim 1.

Claims 11-19 and 22 depend from independent Claim 9. When the recitations of Claims 11-19 and 22 are considered in combination with the recitations of Claim 9, Applicants submit that dependent Claims 11-19 and 22 likewise are patentable over Honarvar.

For at least the reasons set forth above, Applicants respectfully request that the Section 102 rejection of Claims 1-22 be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,



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